

JA 4027

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ZUCKER, GOLDBERG & ACKERMAN

Attorneys for Secured Creditor

Wells Fargo Bank, NA

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	:	UNITED STATES BANKRUPTCY COURT
	:	FOR THE DISTRICT OF NEW JERSEY
IN RE:	:	
	:	CHAPTER 13
Randolph C Lafferty	:	
Debra A Lafferty	:	CASE NO. 10-41693-GMB
	:	NOTICE OF OBJECTION
	:	(CONFIRMATION HEARING DATE:
DEBTORS.	:	01/05/2011 @ 9:00am)

The undersigned, ZUCKER, GOLDBERG & ACKERMAN, attorneys for Secured Creditor, Wells Fargo Bank, NA , the holder of a Mortgage on the debtors' premises at 155 Loeffel Court, Hamilton, NJ 08330, hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan in the event the debtors fail to make the regular monthly mortgage payments to the Secured Creditor, outside of the Chapter 13 Plan, in accordance with the provisions of said Plan, in violation of 11 U.S.C. 1326.

Furthermore, the Secured Creditor objects to any provision in the debtors plan which provides for an amount less than the amount due the Secured Creditor as set forth in its Proof of Claim.

In the event the debtors cure the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and the aforesaid objection should be deemed waived.

ZUCKER, GOLDBERG & ACKERMAN
Attorneys for Secured Creditor
Wells Fargo Bank, NA

/s/ JOEL A. ACKERMAN
JOEL A. ACKERMAN
MEMBER OF THE FIRM

**THIS IS AN ATTEMPT TO COLLECT A DEBT.
ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**